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Attorney for defendant
William Owen

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

SARAH ANDERSON,
FABIAN GOMEZ,
EPIFANIO RAMIREZ,
WENDY LABUDA,
WILLIAM OWEN,
JOALEEN ROGERS,

Defendants.

CASE NO. 2:22-CR-147-WBS

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
ORDER

DATE: February 24, 2025
TIME: 9:00 a.m.
COURT: Hon. William B. Shubb

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendants, by and through defendant's counsel of record, hereby stipulate as follows:

1. This case is set for a status conference on February 24, 2025.
2. By this stipulation, defendants now move to continue the status conference until April 14, 2025, and to exclude time between February 24, 2025, and April 14, 2025, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has produced discovery in this matter, consisting of over 1,300 pages of investigative reports, photographs and video surveillance evidence for multiple controlled drug buys. The government has further indicated additional discovery is forthcoming.

1 Additionally, the government is discussing resolution with the individual defense teams. The
2 state of these discussions vary, but the process is ongoing and requires legal research related to
3 resolution discussions (and/or daft plea agreements) and the individual sentencing concerns of
4 each defendant.

5 b) Counsel for defendants have met with their clients to discuss their respective
6 cases. Defense counsel desire additional time to conduct investigation into the charges, the
7 alleged roles of their respective clients, and to review discovery in this case. Defense counsel
8 will need additional time to discuss potential resolutions with their clients, prepare pretrial
9 motions, and otherwise prepare for trial.

10 c) Counsel for defendants believe that failure to grant the above-requested
11 continuance would deny them the reasonable time necessary for effective preparation, taking into
12 account the exercise of due diligence.

13 d) The government does not object to the continuance.

14 e) Based on the above-stated findings, the ends of justice served by continuing the
15 case as requested outweigh the interest of the public and the defendant in a trial within the
16 original date prescribed by the Speedy Trial Act.

17 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
18 et seq., within which trial must commence, the time period of February 24, 2025 to April 14,
19 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
20 T4] because it results from a continuance granted by the Court at defendant's request on the basis
21 of the Court's finding that the ends of justice served by taking such action outweigh the best
22 interest of the public and the defendant in a speedy trial.

23 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
24 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
25 must commence.

26 IT IS SO STIPULATED.

27
28 *[Signatures continue on following page.]*

1 Dated: February 19, 2025

/s/ DANIEL B. OLMOS

DANIEL B. OLMOS
Counsel for Defendant
SARAH ANDERSON

4 Dated: February 19, 2025

/s/ DAVID D. FISCHER

DAVID D. FISCHER
Counsel for Defendant
FABIAN GOMEZ

7 Dated: February 19, 2025

/s/ OLAF HEDBERG

OLAF HEDBERG
Counsel for Defendant
EPIFANIO RAMIREZ

10 Dated: February 19, 2025

/s/ TASHA CHALFANT

TASHA CHALFANT
Counsel for Defendant
WENDY LABUDA

13 Dated: February 19, 2025

/s/ JOHN R. MANNING

JOHN R. MANNING
Counsel for Defendant
WILLIAM OWEN

16 Dated: February 19, 2025

/s/ TAMARA SOLOMON

TAMARA SOLOMON
Counsel for Defendant
JOALEEN ROGERS

19 Dated: February 19, 2025

MICHELE BECKWITH
United States Attorney

/s/JAMES R. CONOLLY

JAMES R. CONOLLY
Assistant United States Attorney

ORDER

IT IS SO FOUND AND ORDERED.

Dated: February 19, 2025



WILLIAM B. SHUBB

UNITED STATES DISTRICT JUDGE